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United States Attorney Southern District of New York

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June 29, 2020

## **By ECF**

The Honorable Jesse M. Furman United States District Judge Southern District of New York Thurgood Marshall United States Courthouse 40 Foley Square New York, New York 10007

Re: New York v. Chad F. Wolf, et al., No. 20 Civ. 1127 (JMF) (S.D.N.Y.)

Lewis-McCoy, et al. v. Chad Wolf, et al., No. 20 Civ. 1142 (JMF) (S.D.N.Y.)

## Dear Judge Furman:

This Office represents the defendants in the above-captioned actions. We write respectfully pursuant to Southern District of New York Electronic Case Filing Rule ("ECF Rule") 21.7(b) to request that the Court place Docket Entry 66-1 in *New York v. Chad F. Wolf, et al.*, No. 20 Civ. 1127 (JMF), and Docket Entry 72-1 in *Lewis-McCoy v. Chad Wolf, et al.*, 20 Civ. 1142 (JMF), under seal. Those records contain inadvertently produced privileged materials.

On June 27, 2020, counsel for the State of New York informed defendants that several portions of Docket Entries 66-1 and 72-1 are marked as privileged, but not redacted. Pursuant to ECF Rule 21.7(a), this Office has contacted the ECF Help Desk to request that those docket entries be temporarily sealed. We have also provided Plaintiffs in both matters with properly redacted versions of those records and requested that they delete any versions of the records they may have saved. Should the Court grant our request and seal Docket Entries 66-1 and 72-1, we will promptly file a corrected version of these records in accordance with ECF Rule 21.7(c).

We thank the Court for its attention to this matter.

Respectfully,

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Acting United States Attorney for the
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Application GRANTED. The Clerk of Court is directed to place Docket Entry 66-1 in New York v. Chad F. Wolf, et al., No. 20 Civ. 1127 (JMF), and Docket Entry 72-1 in Lewis-McCoy v. Chad Wolf, et al., 20 Civ. 1142 (JMF), under seal - with viewing privileges restricted to the Court only. Plaintiffs shall delete any copies of the relevant unredacted materials. Defendants shall promptly file redacted versions on ECF.

The Clerk of Court is directed to terminate Docket Entry 73 in 20 Civ. 1127 (JMF), and Docket Entry 79 in 20 Civ. 1142 (JMF).

SO ORDERED.

June 29, 2020